

Louis H. Weinstein (LW 7868)  
Andrew J. Miller (AM 8160)  
BUDD LARNER, P.C.  
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Short Hills, New Jersey 07078  
(973)379-4800  
Attorneys for Defendants and  
Counterclaim Plaintiffs  
Dr. Reddy's Laboratories, Ltd. and  
Dr. Reddy's Laboratories, Inc.

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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ASTRAZENECA AB, AKTIEBOLAGET  
HÄSSLE and ASTRAZENECA LP, KBI  
INC. and KBI-E, INC.,

Plaintiffs and  
Counterclaim Defendants,

v.

DR. REDDY'S LABORATORIES, LTD. and  
DR. REDDY'S LABORATORIES, INC.

Defendants and  
Counterclaim Plaintiffs.

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07-CV-6790 (CM)(GWG)

**ELECTRONICALLY FILED**

**FOURTH DECLARATION OF HARRY G. BRITTAIN, Ph.D., FRSC  
(Filed in Opposition to AstraZeneca's Motion To Strike)**

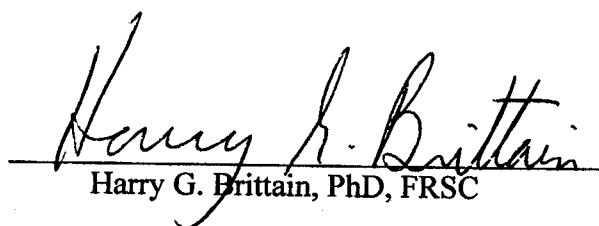
1. I am the same Harry G. Brittain who submitted the Second Declaration of Harry G. Brittain in this litigation, a Declaration which I prepared to support DRL's Motion for Summary Judgment.
2. I also submitted the Third Declaration of Harry G. Brittain in this litigation, a Declaration that I prepared to support DRL's Summary Judgment Reply.
3. I discussed my credentials and professional experience in paragraphs 1-8 of my Second Declaration. A summary of my credentials and professional experience and a copy of my curriculum vitae were attached to my Second Declaration as Exhibit A, and those documents are also attached to this Declaration as Exhibit A.
4. The statements I make in this Declaration are based on my personal knowledge.
5. In connection with this litigation, counsel for DRL asked me for my opinions regarding the alleged infringement of DRL's omeprazole magnesium product in view of United States Patents 5,900,424 and 5,690,960.
6. In coming to the opinions expressed in my Second Declaration, it was necessary for me to know certain facts concerning the processes about which I was being asked to opine. The facts that I wanted to know included factual details such as temperature, pressure, time, weight, reagents, equipment, and processing steps. These are the types of facts that an expert in my field would reasonably rely upon when forming an opinion about a pharmaceutical process.
7. In coming to the opinions expressed in my Second Declaration, I relied in part on the detailed facts regarding temperature, pressure, time, weight, reagents, equipment, and processing steps that were listed in the two summaries presented as part of DRL's Answer to Interrogatory No. 10. A copy of that Interrogatory Answer was attached at pages 9-16 of Exhibit 6 to the Second Declaration of Louis H. Weinstein that was filed in this litigation.

The opinions stated in my Second Declaration were directed to the processes described by the detailed facts listed in those two summaries.

8. The detailed facts regarding temperature, pressure, time, weight, reagents, equipment, and processing steps listed in those two summaries are the type of factual details that an expert in my field would reasonably rely upon in forming opinions as to whether a pharmaceutical process did or did not infringe patent claims directed to pharmaceutical manufacturing methods.
9. After submitting my Second Declaration I was informed by counsel for DRL that AstraZeneca had made an evidentiary objection to my Second Declaration on the ground that I should have based my opinion on the documents contained in the Drug Master File (DMF) and Abbreviated New Drug Application (ANDA) filed by DRL.
10. In preparing my Third Declaration I did review and rely upon the sections of DRL's DMF and ANDA which contained the facts that were relevant to the opinions stated in my Second Declaration.
11. As stated in paragraphs 4 and 8 of my Third Declaration, my opinions regarding DRL's bulk drug substance, DRL's finished drug product, and DRL's manufacturing processes remained the same following my review of the relevant portions of DRL's DMF and ANDA.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.

Signed,

  
Harry G. Brittain, PhD, FRSC

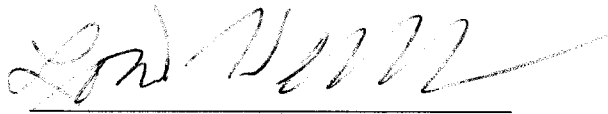
Date: September 3, 2008

CERTIFICATE OF SERVICE

I certify that on this 4th day of September, 2008, I caused a true and correct copy of the FOURTH DECLARATION OF HARRY G. BRITTAIN, Ph.D., FRSC (Filed in Opposition to AstraZeneca's Motion to Strike) to be served upon counsel for AstraZeneca in the following manner:

By ECF, E-MAIL AND FEDERAL EXPRESS

Errol B. Taylor, Esq.  
Milbank, Tweed, Hadley &  
McCloy LLP  
1 Chase Manhattan Plaza  
New York, New York 10005-1413  
Facsimile: 212-530-5219



A handwritten signature in black ink, appearing to read "Errol B. Taylor", is written over a horizontal line.

# EXHIBIT A

Curriculum Vitae

curriculum vitae-JIH\_2

Jacob I. Haft, MD

Office:

20 Prospect Avenue Suite 719  
Hackensack, New Jersey 07601

306 Martin Luther King Boulevard  
Newark, New Jersey 07102

Telephone: (201) 343-8505

Professional Experience:

July 1974 to Present  
Disease)

Private practice of Medicine (Cardiovascular

July 1998 to December 1998

Medical Director, Cardiac Institute  
St. Joseph's Hospital & Medical Center  
Paterson, New Jersey

July 1974 to June 1998

Director, Department of Cardiology  
St. Michael's Medical Center, Newark, New Jersey

July 1974 to present

Clinical Professor of Medicine  
New Jersey College of Medicine & Dentistry

1987 to present  
1987 to 1990

Professor of Medicine  
Chief of Cardiology  
Seton Hall University Post Graduate School of

Medicine

South Orange, New Jersey

July 1969 to June 1974

Chief, Cardiology Section  
Bronx VA Hospital, Bronx, New York

July 1971 to June 1974

Associate Professor of Medicine (Cardiology)  
Mt. Sinai Medical School, New York, New York

July 1969 to June 1971

Assistant Professor of Clinical Medicine  
Mt. Sinai Medical School, New York, New York

July 1969 to June 1975  
(Clinic #19)

Principal Investigator, Coronary Drug Project

Degrees:

(AOA) - 1962

A.B. Harvard (cum laude) - 1958  
M.D. College of Physicians & Surgeons, Columbia Univ

Post Doctoral Training:

1968 - 1969

Cardiology Fellowship, Peter Bent Brigham Hospital  
Boston, Massachusetts  
R. Gorlin, MD - Director

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1965 - 1967 Assistant Chief Research, Cardiopulmonary Laboratory  
USPHS Hospital, Staten Island, New York  
A.N. Damato, MD - Director

1964 - 1965 Cardiology Fellowship, Mt. Sinai Hospital  
New York, New York  
C.K. Friedberg, MD - Director

1967 - 1968 Senior Assistant Resident, First (Columbia )  
Division Bellevue Hospital, New York, New York

1963 - 1964 Junior Assistant Resident  
Beth Israel Hospital  
Boston, Massachusetts

1962 - 1963 Intern (Straight Medicine) Strong Memorial Hospital  
Rochester, New York

Military Service:

1965 - 1967 USPHS, Rank - Surgeon (Lieutenant Commander)  
Military obligation fulfilled (Honorable Discharge)

Honors:

1961 Member Alpha Omega Alpha

1966 Original Research Award, Clinical Society, USPHS

1996 Archbishop McCarrick Medical Teaching Award

Certification:

Diplomate, National Board of Medical Examiners  
Diplomate, American Board of Internal Medicine - 1968  
Diplomate, American Board of Internal Medicine,  
Cardiovascular Subspecialty Board - 1973  
Diplomate, American Board of Internal Medicine,  
Clinical Cardiac Electrophysiology Board - 1994  
Diplomate, Certification Board of Nuclear Cardiology - 2001  
Diplomate, Naspexam - 1968

Licenses: New York, New Jersey

Citizenship: U.S.A.

Editorial Board:

Circulation, 1974 - 1977  
Journal of Cardiovascular Ultrasound, 1981 - 1989  
Contemporary Internal Medicine, 1989 - 1996

Societies:

American Heart Association's Council on Clinical Cardiology,  
Fellow - 1973  
Representative of Council for New Jersey 1977-1980,  
1984-1987  
American College of Physicians, Fellow 1971  
American College of Chest Physicians, Fellow 1971  
Scientific Program Committee, 1989 National Meeting  
American College of Cardiology, Fellow 1973  
Governor for New Jersey, 1979-1982  
Steering Committee, New Jersey Chapter, 1989-1994

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Executive Committee, New Jersey Chapter, 1997-  
American Federation for Clinical Research  
North American Society of Pacing and Electrophysiology

(became Heart Rhythm Society)

Heart Rhythm Society- Fellow 2006

New York Heart Association

New Jersey Heart Association - Member

Board of Directors, 1975-1982

Chairman, Coronary Care Committee, 1977-1979

Nominating Committee, 1981-1982

President North Essex Division, 1992-1995

President Essex County Division, 1996-1997

Essex County Medical Society

State Services:  
Committee, 1978-1986

New Jersey Commissioners of Health's Cardiac Advisory

New Jersey Cardiac Services Task Force, Department of  
Health, May 1985 - June 1987

New Jersey Department of Health, Commissioner's Cardiac

Services Committee, 1987 - 1993

Blue Shield of NJ Multispecialty Advisory Committee,

1982-1996

Vice Chairman, 1990

Publications: See attached bibliography: >170 Papers, 11 Books, >220 Abstracts



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Curriculum Vitae  
Jacob I. Haft, MD

PAPERS:

1. Haft JI, Braverman L: Bilateral lymphoepithelioma of the tonsil. NEJM 271:199, 1964.
2. Kosowsky BD, Stein E, Lau SH, Lister JW, Haft JI, Damato AN: A comparison of the hemodynamic effects of tachycardia produced by atrial pacing and atropine. Am Heart J 72:594, 1966.
3. Lau SH, Stein E, Kosowsky BD, Haft JI, Lister JW, Damato AN: Atrial pacing and atrioventricular conduction in anomalous atrioventricular excitation (Wolff-Parkinson-White Syndrome). Am J Cardiol 19:354-59, 1967
4. Cohen SI, Lau SH, Haft JI, Damato AN: An esophageal electrode for recording arrhythmias. JAMA 200:901, 1967
5. Haft JI, Kosowsky BD, Lau SH, Stein E, Damato AN: Termination of atrial flutter by rapid electrical pacing of the atrium. Am J Cardiol 20:239-44, 1967
6. Cohen SI, Lau SH, Haft JI, Damato AN: Experimental production of aberrant ventricular conduction in man. Circulation 36:673-85, 1967
7. Haft JI, Lau SH, Stein E, Kosowsky BD, Damato AN: Atrial fibrillation produced by atrial stimulation. Circulation 37:70-74, 1968

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8. Lasser RP, Haft JI, Friedberg CK: Relationship of right bundle branch block and marked left axis deviation (with left parietal or peri-infarction block) to complete heart block and syncope. *Circulation* 37:429-37, 1968
9. Cohen SI, Young MW, Lau SH, Haft JI, Damato AN: Effects of reserpine therapy on cardiac output and atrioventricular conduction during rest and controlled heart rates in patients with essential hypertension. *Circulation* 37:738-41, 1968
10. Kosowsky BD, Haft JI, Lau SH, Stein E, Damato AN: The effects of digitalis on atrioventricular conduction in man. *Am Heart J* 75:736-741, 1968
11. Lau SH, Cohen SI, Stein E, Haft JI, Kinney M, Young M, Helfant R, Damato A: Controlled heart rates by atrial pacing in angina pectoris: a determinant of electrocardiographic ST depression. *Circulation* 38:711-20, 1968
12. Damato AN, Lau SH, Stein E, Haft JI, Kosowsky B, Cohen SI: Cardiovascular response to acute thermal stress (hot dry environment) in unacclimated normal subjects. *Am Heart J* 76:769-74, 1968
13. Haft JI, Damato AN: Measurement of collateral blood flow, after myocardial infarction in the closed-chest dog. *Am Heart J* 77:641-48, 1969
14. Cannon PJ, Haft JI, Johnson OM: Visual assessment of regional myocardial perfusion utilizing radioactive Xenon-133 and scintillation photography. *Circulation* 40:277-88, 1969
15. Lau SH, Cohen SI, Stein E, Haft JI, Rosen KM, Damato AN: P waves and P loops in coronary sinus and left atrial rhythms. *Am Heart J* 79:201-14, 1970
16. Helfant RH, Forrester JS, Hampton JR, Haft JI, Kemp HG, Gorlin R: Coronary Heart Disease: Differential Hemodynamics, Metabolic and Electrocardiographic effects in patients with and without angina pectoris during atrial pacing. *Circulation* 42:601, 1970
17. Young BK, Haft JI: Treatment of pulmonary edema with ethacrynic acid during labor. *Am J Obst & Gyn* 107:330, 1970
18. Scherlag B, Helfant RH, Haft JI: Electrophysiology underlying ventricular arrhythmias due to coronary litigation. *Am J Physiology* 219:1665, 1970
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20. Cohen SI, Lau SH, Haft JI: The intensity of the first heart sound in the Wolff-Parkinson-White Syndrome. *Mt. Sinai J of Med* 37:17-22, 1971
21. Haft JI, Herman MV, Gorlin R: Left bundle branch block: Etiologic hemodynamic and ventriculographic considerations. *Circulation* 43:279-87, 1971
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24. Haft JI, Weinstock M, DeGuia R, Gupta PK, Fano A: Assessment of atrioventricular conduction in bilateral bundle branch block and left bundle branch block using HIS bundle electrograms and atrial pacing. *Am J Cardiol* 27(5):474-80, May 1971

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27. Lasser RP, Haft JI, Newman BJ, Allen DF, Ishiguro J, Friedberg CK: Chronic left heart failure - An experimental model in the dog. Mt. Sinai J of Med 38:440-49, Sept-Oct 1971
28. Steiner C, Lau S, Stein E, Wit A, Weiss M, Damato AN, Haft JI, Weinstock M, Gupta P: Electrophysiological documentation of trifascicular block as the common cause of complete heart block. Am J Cardiol 28:436-41, October 1971
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31. Gupta PK, Haft JI: Retrograde Ventriculo-Atrial conduction during complete heart block: Studies with HIS bundle electrography. Amer J Cardiol 30:408, 1972
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34. Pasternac A, Gorlin R, Sonnenblick EH, Haft JI, Kempt HG: Abnormalities of ventricular motion induced with pacing in coronary artery disease. Circulation 45:1195-1205, June 1972
35. Haft JI, Kranz PD, Albert FJ, Fani K: Intravascular platelet aggregation in the heart induced by norepinephrine: Electromicroscopic studies. Circulation 46:698, 1972
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38. Haft JI, Fani K: Intravascular platelet aggregation in the heart induced by stress. Circulation 47:353, 1973
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40. Haft JI, Fano A, Shahabadi A: Clinical experience with Quabain administered in small divided doses in the monitored patient. Chest 63:868, 1973
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conduction. Am J of Cardiol 32:794, 1973

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70. Haft JI: Clinical implications of atrioventricular and intraventricular conduction defects. II. Acute myocardial infarction. Ibid, p. 41-64, 1977
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72. Arkel YS, Haft JI, Kreutner W, Sherwood J, Williams R: Alteration in second phase platelet aggregation associated with an emotionally stressful activity. Thrombosis and Haemostasis 38:552, 1977
73. Schiller MD, Levin AR, Haft JI, Engle MA, Ehlers KH, Klein AA: Electrophysiology studies in sick sinus syndrome following surgery for D-transposition of the great arteries. J of Peds 91:891, 1977
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76. Friedman HS, Zaman Q, Haft JI, Melendez S: Assessment of atrioventricular conduction in aortic valve disease. British Heart J 40:911, 1978
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79. Gutman JA, Haft JI: Chronic chest pain and dyspnea caused by occult constrictive pericarditis. J Med Soc of NJ 76:517-20, 1979
80. Gutman JA, Haft JI: Mediastinal tumor presenting as a new heart murmur. J Med Soc of NJ 76:364-66. 1979
81. Haft JI: Platelets and coronary artery disease. Primary Cardiology 5:97-104, 1979
82. Haft JI, Gonnella GR, Kirtane JS, Anastasiades A: Correlations of the ear crease sign with coronary arteriographic findings. Cardiovascular Medicine 4:861-67, 1979
83. Schiller MS, Levin AR, Haft JI, Klein AA, Ehlers KH, Engle MA: Electrophysiologic studies in a child with concealed preexcitation syndrome. Cardiovascular Medicine 4(3):345-52, March 1979
84. Gutman JA, Haft JI: Atrial fibrillation in the Wolff-Parkinson White Syndrome. J of Med Soc of NJ 76(13):907-12, 1979
85. Haft JI, Pellicano JF, Prior M: Clinical and conceptual implications of coronary arteriographic findings in patients with anterior myocardial infarction. Excerpta Medica International Congress Series 491:406-9, 1980. Timins BI, Gutman JA, Haft JI: Disopyramide induces heart block. Chest 79:472-79, 1981
87. Haft JI: Catecholamines, stress, platelets and coronary artery disease. In "Platelets in Cardiovascular Disease". Edited by J. Mehta. Futura, Mt. Kisco, New York 265-77, 1981
88. Foerster JM, Haft JI, Parmley WM, Russell RO, Norman FW, Bulger JJ: Investigating clues to acute MI; testing the evidence of acute MI. Patient Care 15, 15:22-85, Nov. 15, 1981
89. Agarwal SK, Haft JI: The atrial repolarization wave and spurious ST segment abnormalities. J of Med Soc of NJ 79:315-16, 1982
90. Agarwal SK, Malhotra S, Haft JI: Severe aortic regurgitation - an echocardiographic diagnosis. Arch Int Med 142:1625, 1982
91. Haft JI, Bachik M: Progression of coronary artery disease in patients with chest pain and normal or intraluminal disease on arteriography. Am Heart J 107:35-39, 1982
92. Arkel YS, Haft JI, Buxton M, Herbert S, Burghardt C, Williams R: Emotional arousal and platelet physiology: A review and some original contributions. J of Human Stress 19-27, 1982
93. Agarwal SK, Haft JI: Flail mitral leaflet: An echocardiographic diagnosis. J of Med Soc of NJ 79:404-08, 1982
94. Foerster JM, Haft JI, Parmley WM, Russell RO, Norman FW, Bulger JJ: Acute MI: Steps toward stabilization. Patient Care 16, 19:15-65, Nov. 15, 1982
95. Agarwal SK, Haft JI: Exit Block. J Nat Med Assoc 74:1026-8, 1982
96. Foerster JM, Haft JI, Parmley WM, Russell RO, Norman FW, Bulger JJ: Acute MI: Treatment of complications. Patient Care 17, 5:91-131, Feb. 15, 1983
97. Bachik M, Agarwal SK, Haft JI: Idiopathic hypertrophic subaortic stenosis and acute myocardial infarction. An uncommon association. J Nat Med Assoc



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75:305-309, 1983

98. Haft JI, DeMaio SJ, Bartoszyk OB: Coronary arteriographic findings in symptomatic right bundle branch block. Am J Cardiology 53:770-73, 1984
99. Agarwal SK, Haft JI, Bachik M: Case report: Aneurysm of the descending aorta. NJ J of Med 81:211-13, 1984
100. Agarwal SK, Haft JI, Goldstein JE: Postmyocardial infarction rupture of the ventricular septum. J Med Soc of NJ 81:110-12, 1984
101. Haft JI, Litterer WE: Chewing nifedipine to rapidly treat hypertension. Arch of Int Med 12:2357-59, 1984
102. DeGregorio B, Goldstein JE, Haft JI: Administration of intracoronary streptokinase during menstruation., Am Heart J 109:908-10, 1985
103. Ambrose JA, Winters SL, Arora RR, Haft JI, Goldstein JE, Rentrop KP, Gorlin R, Fuster V: Coronary angiographic morphology in myocardial infarction: A link between the pathogenesis of unstable angina and myocardial infarction. JACC 6:1233-8, 1985
104. Haft JI: Use of calcium-channel blocker nifedipine in the management of hypertension emergency. Amer J Emergency Med Suppl. 3(6):25, Dec. 1985
105. Niemiera MI, Haft JI, Goldstein JE, Hobson RW: Retrograde internal mammary artery flow and resistant angina pectoris: Clue to the coronary-subclavian steal syndrome. Catheterization and Diagnosis 12:93-95, 1986
106. Haft JI, Habbab MA: Effectiveness of IV verapamil preceded by calcium chloride in the treatment of atrial arrhythmias. Arch of Int Med 146:1085, 1986
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108. Habbab MA, Haft JI: Intravenous nitroglycerin in heparin resistance. Ann Int Med 105:305, Aug. 1986
109. Habbab MA, Goldstein JE, Haft JI: Intravenous streptokinase and percutaneous intraaortic balloon counterpulsation used concomitantly. Am Heart J 113:205-207, Jan. 1987
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111. Habbab MA, Haft JI: Characteristic pulsed Doppler findings in patients with flail mitral valve. Chest 91:571-75, April 1987
112. Habbab MA, Haft JI: Heparin resistance induced by intravenous nitroglycerin. Arch Int Med 147:857-60, May 1987
113. Habbab MA, Senft AG, Haft JI: Origin of the right coronary artery from the left anterior descending coronary artery: A very rare anomaly of coronary arterial origin. Am Heart J 114:169-70 July 1987
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115. Angeli SA, Haft JI: Noninvasive determination of cardiac output in patient with mitral stenosis using echocardiographic and Doppler data,. J of Cardiovascular Ultrasonography 6:323-29, Dec. 1987
116. Haft JI, Goldstein JE, DeGregorio B: Aortic valve balloon dilatation:

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117. Haft JI, Altieri JJ, Smith LG, Herskowitz M: Computerized axial tomography of the abdomen in the diagnosis of splenic emboli. Arch of Int Med 148:193-97, Jan. 1988

118. Goulah RD, Goldstein JE, Haft JI: Salvage PTCA in patient who were not candidates for coronary surgery. NJ Med 85:223-25, March 1988

119. Goulah RD, Rose MR, Strober M, Haft JI: Coronary dissection following trauma with systemic emboli. Chest 93:887-8, April 1988

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